



October 14, 2003

BY OVERNIGHT EXPRESS MAIL

Ms. Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: Department Report re: Double Utility Poles D.T.E. 03-87


Dear Secretary Cottrell:

Enclosed for filing please find an original and five (5) copies of the written comments of Fitchburg Gas and Electric Light Company ("FG&E") in the above-referenced proceeding. These comments consist of:

1. FG&E's Response to the Department's October 2, 2003 Memorandum Requests;
2. FG&E's "Double Pole Summary by Municipality" Report;
3. Motion for Admission ProHac Vice
4. Affidavit of Gary Epler

Please stamp one copy "Received" and return to me in the enclosed stamped self-addressed envelop. Thank you for your assistance.

Very truly yours,


Gary Epler
Sr. Regulatory Counsel

Cc: William Stevens, Hearing Officer
All parties on Department service list

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Commonwealth of Massachusetts
Department of Telecommunications and Energy
Report of the Department of Telecommunications and Energy relative to reducing
the Number of Double Utility Poles Within the Commonwealth, Pursuant to
Chapter 46 of the Acts of 2003, Section 110
Docket No. DTE 03-87
Department's October 2, 2003 Request for Information

Department Request: Each company provide the Department the following information:

1. The company's policies and practices to reduce and prevent the accumulation of double poles subject to its control;
2. The status and functioning of the Pole Lifecycle Management system ("PLM") including the effectiveness of this system in meeting the goal of a reduction in the number of double poles; and
3. Information on the following:
 - (a) the number of double poles that existed in each municipality prior to the implementation of the PLM in February 2003;
 - (b) the number of pre-PLM double poles that are still in place in each municipality;
 - (c) the number of double poles in each municipality created post-implementation of the PLM;
 - (d) the number of double poles in each municipality that are still in place today that were created post-implementation of the PLM; and
 - (e) the aggregate number of double poles owned or set by the company that were in existence prior to the implementation of the PLM in February 2003, and the number of those pre-PLM double poles that are still in place today.

Response of FG&E:

1. Policies and Practices for Double Poles

Fitchburg Gas and Electric Light Company ("FG&E") inspects approximately 10 percent of the poles in its area of maintenance responsibility on an annual basis to identify poles which no longer meet safety or performance requirements. Poles identified as failing these requirements during these inspections are scheduled to be replaced the following year under a pole replacement program, unless they are considered hazardous and in need of immediate attention. These hazardous poles are replaced as soon as practical after they are discovered.

In an effort to reduce the number of double poles created on the FG&E system, the company has modified its practices with respect to the pole replacement program.

In the past, one crew was assigned to set new poles at the locations identified during the inspections. At the company's discretion, other crews would be scheduled to make the transfers of the electrical attachments on the poles. Any delay in making the electric transfers, or subsequent delays among other attachées on the pole, along with the lack of

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an effective communication system among the attachees, would have an impact upon the overall time the double pole stayed in the ground, and lead to a backlog of double poles.

FG&E's practice has recently been modified so that the company will create no more than 10 double poles at a time under the pole replacement program. Before setting any more poles, all the electrical transfers will be completed. While other double poles associated with specific system improvement projects may still be created, these poles are typically set in the course of that project and are usually dealt with quickly. The setting of the new pole and the completion of the electrical transfer is only the first step in the removal process, and all the other parties on the pole still need to transfer their facilities before the old pole can be removed from the ground.

FG&E is confident that this new practice will ensure that it meets its responsibilities of prompt removal of double poles by allowing a quicker hand-off to the next responsible attachee on the pole.

To further enhance its efforts in removing double poles, FG&E purchased a jaw bucket for use on one of its backhoes last year. Because of the relatively small size of the FG&E service territory, this backhoe can be driven throughout the area and the jaw bucket used to quickly remove the pole butts from the ground once all transfers are complete. The addition of this equipment has allowed the company to roughly double the number of poles a crew can remove in a day, going from about 6 pole butts to 12. The company is confident that the addition of this equipment will also enhance its ability to more effectively manage the double poles in its area.

2. Pole Lifecycle Management System

The Pole Lifecycle Management ("PLM") system has been utilized by FG&E since October, 2002. Only data for the FG&E maintenance area was inputted at that time, however. Data entry went smoothly. All the backlog double poles which had been identified on the system were entered at that time. Because of the relatively small size of the Fitchburg system, all data was entered manually.

The introduction of the PLM system has greatly enhanced the company's ability to manage its double poles. It has replaced a paper trail system that impeded communication about the status of attachees on the poles to one where actions are quickly and effectively communicated among the pole owners and attachees. Under the paper system, poles ready for transfer were communicated a couple of times per year through a paper document. Generally, no feedback was received until the recipient had completed all the work on the list. Often, the only way to determine which double poles could be

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removed was to take a physical inventory by driving around the system. Today we are aware in real time that transfers have taken place. We can go into the system and print out reports that give a list of all the locations where the electrical transfers remain pending, as well locations where all attachee transfers have been made and the pole butts are ready for removal. None of that data was available on a real time basis under the old paper system.

The PLM system is still in its infancy, and needs time to develop into a more effective tool the companies can use to manage their double poles. There are still some issues to be resolved with respect to timely and accurate data entry. As the emphasis on the control of the double pole issue grows, users will become more aware of the significance of using the system to its fullest capabilities, and the double pole issue should be brought under control.

3. Pole Counts

(a) The number of poles that existed in each municipality prior to the implementation of the PLM in February 2003:¹

Ashby:	113 double poles
Fitchburg:	127 double poles ²
Lunenburg:	11 double poles
Townsend:	16 double poles

(b) The number of pre-PLM double poles that are still in place in each municipality:³

Ashby:	77 double poles (19 in remediation, 58 in transfer stage ⁴)
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¹ For purposes of the data provided in this report, FG&E considers pre-PLM to refer to the time period up to February 1, 2003, and post-PLM to refer to February 1, 2003 and thereafter. Please also note that there are minor differences between the data provided in this response and the data provided in the "Double Pole Summary By Municipality" Report, which follows. This difference is due to timing differences as to when data is entered into the PLM system from which the latter Report is produced.

² In the municipalities of Fitchburg and Townsend, where both Verizon and FG&E share maintenance responsibilities, at least some of the poles reported will be duplicated on both company reports. In other words, one cannot add the reports of each company together and get the number of double poles – the actual number will be lower.

³ FG&E was able to provide the data requested in 3(b),(d) and (e) by reviewing each pole set individually in the municipalities. This could be accomplished only because of the limited size of the FG&E system.

⁴ "Remediation" refers to poles which are ready to be removed from the ground, where all transfers have been completed. "Transfer stage" means that one or more of the attachees on the pole still needs to move from the old to the new pole. The numbers provided here do not indicate who is responsible for the next operation at the pole, whether it involves remediation or transfer.

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Fitchburg: 127 double poles (53 in remediation, 21 in transfer stage)
Lunenburg: 11 double poles (7 in remediation, 4 in transfer stage)
Townsend: 16 double poles (0 in remediation, 16 in transfer stage)

(c) The number of double poles in each municipality created post-implementation of the PLM:

Ashby: 1 double pole (0 in remediation, 1 in transfer stage)
Fitchburg: 26 double poles (5 in remediation, 21 in transfer stage)
Lunenburg: 21 double poles (8 in remediation, 13 in transfer stage)
Townsend: 64 double poles (6 in remediation, 58 in transfer stage)

(d) The number of double poles in each municipality that are still in place today that were created post-implementation of the PLM:

Ashby: 1 double pole (0 in remediation, 1 in transfer stage)
Fitchburg: 26 double poles (5 in remediation, 21 in transfer stage)
Lunenburg: 21 double poles (8 in remediation, 13 in transfer stage)
Townsend: 64 double poles (6 in remediation, 58 in transfer stage)

(e) The aggregate number of double poles owned or set by the company that were in existence prior to the implementation of the PLM in February 2003, and the number of those pre-PLM double poles that are still in place today:

267 double poles prior to PLM implementation
231 double poles prior to PLM implementation still in place today.

Total double poles (pre-PLM and post-PLM) still in place (3(b) plus 3(d)):

Ashby: 78 double poles
Fitchburg: 153 double poles
Lunenburg: 32 double poles
Townsend: 80 double poles

Double Pole Summary By Municipality Report

Report
Date: 10/10/2003

FITCHBURG GAS AND ELECTRIC

Search Criteria:

State: MASSACHUSETTS

Municipality: ASHBY

Municipality	Transfers					Remediation		Total Poles
	Electric	Fire	Private	CATV/Fiber	Telephone	Telephone	Electric	
ASHBY	0	0	0	0	59	0	19	78
Total:	0	0	0	0	59	0	19	78

Double Pole Summary By Municipality Report

Report
Date: 10/10/2003

FITCHBURG GAS AND ELECTRIC

Search Criteria:

State: MASSACHUSETTS

Municipality: FITCHBURG

Municipality	Transfers					Remediation		Total Poles
	Electric	Fire	Private	CATV/Fiber	Telephone	Telephone	Electric	
FITCHBURG	9	1	0	9	76	50	12	157
Total:	9	1	0	9	76	50	12	157

Double Pole Summary By Municipality Report

Report
Date: 10/10/2003

FITCHBURG GAS AND ELECTRIC

Search Criteria:

State: MASSACHUSETTS

Municipality: LUNENBURG

Municipality	Transfers					Remediation		Total Poles
	Electric	Fire	Private	CATV/Fiber	Telephone	Telephone	Electric	
LUNENBURG	11	0	0	2	5	15	0	33
Total:	11	0	0	2	5	15	0	33

Double Pole Summary By Municipality Report

Report
Date: 10/10/2003

FITCHBURG GAS AND ELECTRIC

Search Criteria:

State: MASSACHUSETTS

Municipality: TOWNSEND

Municipality	Transfers					Remediation		Total Poles
	Electric	Fire	Private	CATV/Fiber	Telephone	Telephone	Electric	
TOWNSEND	22	4	0	22	26	6	0	80
Total:	22	4	0	22	26	6	0	80

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**Report of the Department of Telecommunications and
Energy relative to reducing the number of double
utility poles within the Commonwealth, pursuant to
Chapter 46 of the Acts of 2003, Section 110**

D.T.E. 03-87

MOTION FOR ADMISSION PRO HAC VICE

The undersigned counsel for Fitchburg Gas and Electric Light Company (“FG&E”), Gary Michael Epler, hereby moves for admission pro hac vice in the above captioned proceeding before the Massachusetts Department of Telecommunications and Energy (“Department”), pursuant to 220 CMR 1.02 and 801 CMR 1.01. In support of this motion, Mr. Epler states as follows:

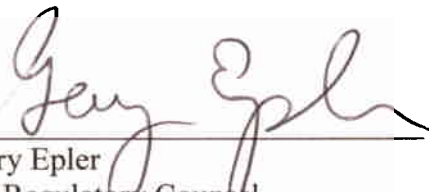
1. By order of Notice dated September 10, 2003, the Department opened this proceeding to address the provision of Chapter 46 of the Acts of 2003, Section 110 which requires the Department to issue a report by November 28, 2003 relative to reducing the number of double utility poles within the Commonwealth.
2. Mr. Epler is employed as Senior Regulatory Counsel by Unitil Service Corp., 6 Liberty Lane West, Hampton, New Hampshire, 03842.
3. As shown in the attached affidavit, Mr. Epler is a member in good standing of the New Hampshire, New Jersey, New Mexico (in-active status) and New York bars and is currently admitted to practice before the New Hampshire, New Jersey, New Mexico and New York state courts, the federal district courts located in each of these states, as well as the federal 1st, 2nd, 3rd, 10th and District of Columbia Courts of Appeals. Mr. Epler is in the process of completing and submitting his Application for

Admission on Motion to the bar of the Commonwealth of Massachusetts. Mr. Epler is not currently and has never been suspended or disbarred in any jurisdiction and there are no disciplinary proceedings pending against him in any jurisdiction. He is familiar with the facts of this proceeding for which FG&E shall appear before the Department and agrees to adhere to the Department's rules and orders, and applicable agreements between the parties.

WHEREFORE, Mr. Epler respectfully requests that the Department permit him to appear pro hac vice for the purpose of representing FG&E in this proceeding, and requests further that this motion be deemed to satisfy the requirement of 220 CMR 1.02(7) regarding the filing of an Appearance.

Dated: October 14, 2003

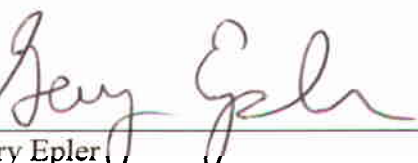
Respectfully submitted,



Gary Epler
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Certificate

I certify that copies of this Motion Pro Hac Vice and accompanying affidavit have been served this 14th day of October, via First Class U.S. Mail, upon each entity identified on the Department's service list for this proceeding.



Gary Epler

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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D.T.E. 03-87

AFFIDAVIT

Gary Michael Epler, having been duly sworn, states under oath as follows:

1. I am over eighteen years of age; I am competent to provide this affidavit; and I have personal knowledge of the facts set forth below.
2. I am employed by Unitil Service Corp. ("USC") as Senior Regulatory Counsel.
3. USC is a corporation providing services to the subsidiaries of Unitil Corporation, a New Hampshire corporation and a registered holding company under the Public Utility Holding Company Act of 1935.
4. Fitchburg Gas and Electric Light Company is a wholly owned subsidiary of Unitil Corporation.
5. I am a member in good standing of the New Hampshire, New Jersey, New Mexico (in-active status) and New York bars and am currently admitted to practice before the New Hampshire, New Jersey, New Mexico and New York state courts, the federal district courts located in each of these states, as well as the federal 1st, 2nd, 3rd, 10th and District of Columbia Courts of Appeals. I am in the process of completing and submitting my Application for Admission on Motion to the bar of the Commonwealth of Massachusetts.
6. I am not currently and have never been suspended or disbarred in any jurisdiction and there are no disciplinary proceedings pending against me in any jurisdiction.

